

ATTACHMENT 2

1 engineers. They called us field service
2 engineers.

3 Q. So instead of a field service
4 technician, you were a field service engineer?

5 A. Yeah.

6 Q. Did your job description change in any
7 way?

8 A. No.

9 Q. Can you please tell me, what does --
10 strike that. For how long were you a field
11 service engineer?

12 A. Since 1988, when I joined Atlas.

13 Q. Can you please tell me, sir, what a
14 field service engineer does.

15 A. We are responsible for installation,
16 commissioning, operator training, maintenance
17 training, and also the field service and repair
18 of Atlas machines.

19 Q. Is that a full-time position?

20 A. Yes.

21 Q. And what training did you receive from
22 Atlas with respect to those job duties?

23 A. I went to -- when I first started in
24 1988, I went to England, where our factory is,
25 and received some training on our machines there.

1 And then over the years, I've gone back to
2 England. I've received training from our
3 engineers in England when they came here to
4 install machines.

5 Q. Approximately how many times have you
6 returned to England for training sessions?

7 A. Three, I believe.

8 Q. Other than those three times, have you
9 received any other training from Atlas?

10 A. Yes.

11 Q. What other training have you received
12 from Atlas?

13 A. On-site training.

14 Q. Can you describe that training?

15 A. We have on occasion, and in years past
16 it was quite frequent, engineers from England who
17 would come over to install machines that I had
18 never seen before. So I would go to these
19 customer sites with these engineers and receive
20 training from them on new equipment that we were
21 using, new software.

22 Q. Are you finished?

23 A. That's about it.

24 Q. What about from Valmet? Did you receive
25 any training from Valmet with respect to your job

1 duties as a field service engineer?

2 A. From Valmet, no.

3 Q. And what about from Bobst in your
4 position as a field service technician; did you
5 receive any training from them?

6 A. No.

7 Q. So would it be safe to say that all of
8 the training that you've had with respect to your
9 job description has come from Atlas?

10 A. Yes.

11 Q. And you've indicated that you are also
12 responsible for training operators and
13 maintenance individuals?

14 A. Yes.

15 Q. Can you describe that?

16 A. When we install a machine, after we have
17 done all of our tests and checks, and we're
18 satisfied that the machine is running the way
19 it's supposed to, we take operators and train
20 them on -- if the machine has a computer, we
21 train them on how to use the computer, the basics
22 on how to run the machine, how to set up the
23 machine, and anything else that they need to
24 know.

25 A lot of times we put machines in where

1 they already have machines, so they already know
2 about running a slitter. They just need to know
3 the specifics of our machine.

4 Q. What about training with respect to the
5 maintenance personnel?

6 A. We do a -- it depends on the location
7 and what the customer wants. But normally, we do
8 an overview of the machine, basically how the
9 machine works. We point out any hardware,
10 software, anything else that is used on the
11 machine, and do brief training -- not really
12 training. We just give a brief overview on
13 components that we buy for the machines, PLCs,
14 PCs, drives, anything else that's used in the
15 machine.

16 Q. When you say training, this is with
17 respect to components that you buy for the
18 machine? Is that how you said it?

19 A. Right.

20 Q. And that would include drives?

21 A. It would include drives, yes.

22 Q. And when you're referring to the
23 maintenance, is this more along the lines of
24 preventive maintenance?

25 A. We explain the preventative maintenance,

1 Q. And under what conditions or what
2 applications would speed -- those be set for the
3 speed control?

4 A. We make other machines where the cores
5 are not locked to the motor through the chucks,
6 like on the Proma machine. In those machines, we
7 allow the chuck or the rewind shaft to slip
8 inside the core to develop tension. So on that
9 type machine, we would use speed control.

10 Q. From 1993 up until today, has Proma ever
11 used speed control on their Infranor drives?

12 A. No.

13 Q. Within the -- strike that. Of the
14 Infranor drives at Proma, are they all set to
15 torque?

16 A. They should be set to torque.

17 Q. Does each one of them have the ability
18 to set to torque or speed?

19 A. The ability exists, yes.

20 Q. I'm going to get a little bit ahead of
21 myself, but am I correct that the method by which
22 you would set the speed or torque is on the
23 daughter card?

24 A. No.

25 Q. How would you set them to either torque

1 or speed?

2 A. I don't know the specifics. There are
3 some modifications that are done to the drive,
4 but I don't know the specifics.

5 Q. Without going into the specifics
6 obviously, where do you get the information that
7 there are modifications done to the drive?

8 A. From England.

9 Q. And can you describe for me how those
10 modifications are made?

11 A. I don't know. I've never modified one
12 myself. I don't know.

13 Q. Who modifies them?

14 A. I don't know.

15 Q. Are they modified before they get to
16 Proma?

17 A. They would be modified before Proma,
18 yes.

19 Q. Are they modified at the
20 Bobst/Valmet/Atlas facility in North Carolina?

21 A. No.

22 Q. Are you the person that would be
23 responsible to order the board with the
24 modification?

25 A. No.

1 A. No.

2 MS. COUNIHAN: I don't need to mark
3 this. Do you want this marked?

4 MR. KELLEHER: No.

5 MS. COUNIHAN: Thank you.

6 BY MS. COUNIHAN:

7 Q. Getting back to the modifications made
8 to a drive board prior to it being sent to Proma,
9 you do have an understanding that some
10 modifications are made to the boards, correct?

11 A. I don't know which way the modification
12 works. I don't know if it's a modification to
13 take a standard board, being speed control, and
14 convert it to torque control, or whether the
15 standard board is torque control and it has to be
16 modified to become speed control. I don't know
17 which way that works.

18 Q. So it's possible that the boards that
19 Proma orders are not modified; it's the people
20 that order for the speed control that get their
21 boards modified?

22 A. That's correct.

23 Q. Are there also modifications made to the
24 daughter card before the board is shipped to
25 Proma?

1 A. Not that I'm aware of.

2 Q. Can a customer call Atlas UK themselves
3 and order a board?

4 A. Sure.

5 Q. Can they call Infranor?

6 A. Sure.

7 Q. Do you know whether Proma has ever
8 contacted Infranor directly?

9 A. I don't have any knowledge one way or
10 the other.

11 Q. Does Atlas own Infranor or have any
12 ownership interest in Infranor?

13 A. No.

14 Q. They're separate and distinct entities?

15 A. Yes.

16 Q. If you know this answer, when Proma
17 would call the Charlotte facility to request a
18 board, do you know the process by which a board
19 is sent to Proma?

20 A. No.

21 Q. Is it fair to say that boards are not
22 kept in any type of inventory in North Carolina?

23 A. At this moment, no.

24 Q. Have there ever been boards kept in
25 inventory?

1 Q. Do you know what other documents would
2 be kept in the physical file relative to each
3 particular serial number?

4 A. No.

5 MS. COUNIHAN: Can we just go off the
6 record for a second?

7 (There was a discussion off the record.)

8 BY MS. COUNIHAN:

9 Q. Is there a physical file called serial
10 or contract number 92036?

11 A. I don't know.

12 Q. If there was, where would it be?

13 A. I'm not sure. I don't know.

14 Q. Who would be the better person to ask
15 that?

16 A. Rick Howe.

17 Q. When Proma would call to purchase a new
18 board, it goes through Atlas UK. What about if
19 Proma sends a board down for repair, where is
20 that repair done?

21 A. I don't know.

22 Q. That's nothing you do?

23 A. It's nothing I do, no.

24 Q. Who at Bobst/Valmet/Atlas repaired
25 boards, if anyone?

1 A. No one.

2 Q. It would get sent to the UK?

3 A. I don't know.

4 Q. So you don't know what happens to a
5 board that's sent down here for repair?

6 A. No.

7 Q. What about diagnostics; is that
8 something that you would do down here, or no?

9 A. No.

10 Q. Are any records kept of boards sent back
11 down here for repairs?

12 A. I don't know.

13 Q. Are you familiar at all with the process
14 that a board would be sent down here for a
15 repair?

16 A. No.

17 Q. In general, do you understand that some
18 repairs would be done by the Proma employees at
19 the Proma facility?

20 A. I don't know. I don't know if they do
21 some of their own repairs or not.

22 Q. Did you provide any training to any
23 Proma employees with respect to repairing the
24 Infranor drives?

25 A. No.

1 position of the switch?

2 A. Not to my knowledge.

3 Q. But you did indicate that this operating
4 guide is specific to this piece of equipment,
5 correct?

6 A. Yes.

7 Q. And does the operating guide cover
8 maintenance?

9 A. No.

10 Q. What things are covered in the operating
11 guide?

12 A. The operator adjustments, the computer
13 screen, how to navigate through all the menus on
14 the computer screen, how to set up the machine on
15 the computer, how to actually physically set up
16 the machine to do your product. There's usually
17 a section in there on problems you may have with
18 quality, product quality, and things you can do
19 to correct that sort of thing.

20 Q. Does Atlas provide, or did Atlas provide
21 to Proma any written materials specifically
22 addressing the switch position?

23 MR. KELLEHER: Objection.

24 A. Yes.

25 Q. What materials were provided to Van Leer

1 and/or Proma regarding switch position?

2 A. The best I can remember on this machine,
3 in the drawings, the section that gives the
4 details for the Infranor rewind drives has a note
5 that tells about this switch.

6 Q. You said that that is in the drawings?

7 A. It's in the -- if I remember correctly,
8 it's in the electrical schematics.

9 Q. And how are those given to Atlas? Do
10 they just come with the machine?

11 A. I don't know. How are they given to
12 Atlas?

13 Q. I'm sorry, to Proma.

14 A. Yes, they come with the machine.

15 Q. Now, your experience with new
16 installations, do you go through all of those
17 documents with the facility's engineers?

18 A. It depends. Some customers request that
19 we sit down with them and go through each drawing
20 and look and see everything they have, and if
21 they have questions. And some don't.

22 Q. So it's done on a customer-by-customer
23 basis?

24 A. Yes.

25 Q. I'm going to show you two pieces of